



08-CR-00105-INDI

Presented to the Court by the foreman of the
Grand Jury in open Court, in the presence of
the Grand Jury and FILED in The U.S.
DISTRICT COURT at Seattle, Washington.

..... April 2, 2008
By Bruce Rifkin Deputy
BRUCE RIFKIN, Clerk

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSE MANUEL NUNEZ-MALDONADO
a/k/a Primitivo

Defendant.

NO. **CR08 0105**
INDICTMENT **Rsm**

The Grand Jury charges that:

Count 1
(Conspiracy to Distribute Methamphetamine)

Beginning at a time unknown, but within the last five years, and continuing until
on or about March 29, 2008, in King County within the Western District of Washington,
and elsewhere, JOSE MANUEL NUNEZ-MALDONADO, and others known and
unknown, did knowingly and intentionally conspire to distribute a mixture or substance
containing a detectable amount of methamphetamine, its salts, isomers, and salts of its
isomers, a substance controlled under Schedule II, Title 21, United States Code, Section
812.

1 The Grand Jury further alleges that this offense involved 500 grams or more of a
 2 of a mixture or substance containing a detectable amount of methamphetamine, its salts,
 3 isomers, and salts of its isomers.

4 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)
 5 and 846.

6 ALLEGATION OF FORFEITURE

7 Pursuant to Title 21, United States Code, Section 853, the defendants shall forfeit
 8 to the United States his interest in any property, real or personal, constituting, or derived
 9 from, any proceeds they obtained, directly or indirectly, as the result of the offenses
 10 charged above and any property used, or intended to be used, in any manner or part, to
 11 commit, or to facilitate the commission of such offenses to include, but not limited to,
 12 approximately \$524,380 in United States currency seized on March 5, 2008 from a
 13 Volkswagen Passat vehicle bearing California license plate 5LID814, and on March 28,
 14 2008 from 19480 SE 266th Street in Covington, Washington. If any of the forfeitable
 15 properties, as a result of any act or omission of the defendant --

- 16 (1) cannot be located upon the exercise of due diligence;
- 17 (2) has been transferred or sold to, or deposited with, a third party;
- 18 (3) has been placed beyond the jurisdiction of the court;
- 19 (4) has been substantially diminished in value; or,
- 20 (5) has been commingled with other property which cannot be divided
- 21 without difficulty;

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1 it is the intent of the United States, pursuant to Title 21, United States Code,
2 Section 853(p), to seek forfeiture of any other property of the defendants up to the
3 value of the above-described property.

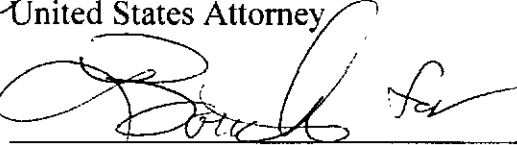
4
5 A TRUE BILL
6 DATED:

7 *(Signature of Foreperson redacted pursuant to the*
8 *policy of the judicial conference.)*

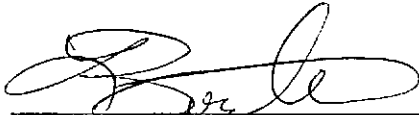
9 FOREPERSON

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11 

12 JEFFREY C. SULLIVAN
13 United States Attorney

14 

15 DOUGLAS B. WHALLEY
16 Assistant United States Attorney

17 

18 LISCA BORICHEWSKI
19 Assistant United States Attorney